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Attorneys for Plaintiffs
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF CIMONE A.
NUNLEY IN SUPPORT OF
PLAINTIFFS' REPLY TO PLAINTIFFS'
MOTION FOR SANCTIONS**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of
5 Plaintiffs' Motion for Sanctions. I have personal knowledge of the facts stated herein and if
6 called upon to testify, I could and would competently testify thereto, except as to those matters
7 that are stated upon information and belief.
8

9 2. Our office has four attorneys. Our firm began a trial on December 3, 2019 in
10 Merced Superior Court. The trial continued until December 18, 2019.

11 3. During the trial, I was the only attorney remaining in the office to handle matters
12 pertaining to all other cases.
13

14 4. Promptly following the conclusion of the trial, I drafted and brought the instant
15 motion for sanctions on January 13, 2020.

16 5. Attached hereto as Exhibit 1 is a true and correct copy of various excerpts from
17 the deposition of Michael Wheeler in this matter.
18

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct. Executed on February 3, 2020 in San Anselmo, California.
21

22
23 DATED: February 3, 2020

By: 

Cimone A. Nunley, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ